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January 30, 2007

**VIA EMAIL AND HAND DELIVERY**

The Honorable Vincent J. Poppiti  
Blank Rome LLP  
1201 Market Street, Suite 800  
Wilmington, DE 19801

**Re:** *LG.Philips LCD Co., Ltd. v. ViewSonic Corp., et al.*, C.A. No. 04-343-JJF

Dear Special Master Poppiti:

On January 29, 2007, counsel for L.G. Philips LCD Co., Ltd. ("LPL") wrote to Your Honor suggesting that the Tatung defendants have been less than cooperative by failing to agree with LPL's definitions contained in Mr. Christenson's letter of January 24, 2007, which was attached to Mr. Kirk's letter. This subject was addressed during the last telephonic hearing with Your Honor and the parties were specifically instructed at that time to meet and confer on this issue. *See* letter from Jaclyn Mason, dated January 22, 2007.

Needless to say, the parties have been and continue to meet and confer on this subject. At this time, there is no motion pending on this issue. Against this backdrop, LPL's unilateral January 29, 2007 submission is inappropriate. While Your Honor requested an update by January 29, 2007 regarding the status of the parties' discussions, LPL's January 29 letter is completely one-sided and unfairly implies that the Tatung defendants are unreasonably delaying and disagreeing with LPL's proposals. to the contrary, the Tatung defendants are continuing the dialogue with LPL on this issue and are hopeful that they can reach a mutually satisfactory agreement with LPL so as to avoid troubling Your Honor with this issue.

LPL's continued practice of "record making" is not called for under the Local Rules or the Special Master's procedures particularly where the meet and confer process is still ongoing. In addition, LPL's practice of presenting argument through status letters simply should not be countenanced since there is no motion pending or relief sought and the parties have not concluded the meet and confer process. Tatung does not believe that Mr. Kirk's partisan "progress report" on the parties' negotiations is appropriate or conducive to reaching a negotiated resolution. The Tatung defendants respectfully propose that the parties provide Your Honor with a truly joint status report at the conclusion of the meet and confer process. To this

The Honorable Vincent J. Poppiti  
January 30, 2007  
Page 2

end, the Tatung defendants suggest that the joint status report on this issue be due on or before February 5, 2007.

As always, counsel is available at Your Honor's convenience to discuss this or any other issue in the above-referenced case.

Respectfully,

  
Anne Shea Gaza (#4093)

ASG/afg

cc: Clerk of the Court (via hand delivery)  
Richard D. Kirk, Esquire (via hand delivery)  
Jeffrey B. Bove, Esquire (via hand delivery)  
Lora A. Brzezynski, Esquire (via Federal Express)  
Tracy R. Roman, Esquire (via Federal Express)  
Scott R. Miller, Esquire (via Federal Express)